Bowyer Environmental Consulting



March 17, 2009

VIA ELECTRONIC MAIL

Mr. Charles Woltmann Sunkist Growers Inc. 14130 Riverside Drive Sherman Oaks, CA 91423

Subject: Work Plan for Recommended Environmental Activities

Former Sunkist Citrus Processing Plant

616 East Sunkist Street Ontario, California

Dear Mr. Woltmann:

At the request of Sunkist Growers Inc. (Sunkist), Bowyer Environmental Consulting, Inc. (BEC) has prepared this Work Plan for Recommended Environmental Activities (Work Plan) at the former Sunkist Citrus Processing Plant located at 616 East Sunkist Street in Ontario, California (Site). The Site location is shown on Figure 1.

The primary objectives associated with the scope presented in this Work Plan are to:

- Evaluate the geophysical anomalies to determine if underground storage tanks (USTs) are present; and
- Implement shallow soil excavations to address the areas that exhibited chemicals concentrations in excess of conservative cleanup criteria.

SITE BACKGROUND

The approximately 11.11-acre Site is located in the City of Ontario, approximately 1 mile west of the Ontario International Airport, and between the San Bernardino Freeway (Highway 10) to the north, and the Pomona Freeway (Highway 60) to the south. The Site is bounded primarily by industrial properties, although a residential neighborhood is located directly west of the northern portion of the Site.

Leighton Consulting, Inc. (Leighton) conducted a Limited Phase II Environmental Site Assessment (Limited Assessment) at the Site in October 2008 in association with a preacquisition due diligence effort conducted by the City of Ontario. This Limited Assessment involved a geophysical survey and the installation of 79 soil borings. The locations of the 79 soil borings installed by Leighton are shown on Figure 2.

Leighton identified six locations that, based on the presence of geophysical anomalies, might be associated with the presence of USTs. The locations of these anomalies (Anomalies A through F) are shown on Figures 3 and 4.

Selected soil samples collected during the Limited Assessment were reportedly tested by United States Environmental Protection Agency (USEPA) Method 8015M for a full range of total petroleum hydrocarbons (TPH), USEPA Method 8310 for polynuclear aromatic hydrocarbons (PAHs), USEPA Method 8082 for polychlorinated biphenyls (PCBs) USEPA Method 6010B and 7471A for CAM metals, USEPA Method 8270 C for semi-volatile organic compounds (SVOCs), USEPA Method 8260B for volatile organic compounds (VOCs) and USEPA Method 7096A for hexavalent chromium.

The report for the Limited Assessment states that PAHs, SVOCs, and VOCs were not detected above method detection limits in the samples analyzed. The report also provided a summary of composited CAM metals, PCBs, and TPH results on a series of tables and figures. Based on these summaries, Leighton identified three potential area of concern. These potential areas of concern are:

• Location 11 – Three samples collected from 2.5 feet bgs at three different locations (11A, 11B and 11C) contained PCB concentrations of 1.24 milligrams per kilogram (mg/kg), which is higher than the California Human Health Screening Level (CHHSL) of 0.3 mg/kg. The CHHSLs are conservative screening criteria which are used to define the need for further evaluation when point source data is found in excess of the associated CHHSL. Location 11 and the three discrete soil borings that were composited are shown on Figure 3.

- **Location 20** One samples collected from 0.5 feet bgs at this location contained PCB concentrations of 2.38 milligrams per kilogram (mg/kg), which is higher than the CHHSL of 0.3 mg/kg. The location of this sample is shown on Figure 2.
- Location 24 Three samples collected from 0.5 feet bgs at three different locations (24A, 24B, and 24C) contained total lead concentrations of 4,030 mg/kg and a TPH in the motor oil range (C23 to C35) of 1,230 mg/kg. The reported lead concentration is higher than the CHHSL of 3,500 mg/kg, and is higher than the USEPA Region IX Industrial Preliminary Remediation Goal (PRG) of 800 mg/kg. The PRGs, like the CHHSLs are conservative screening criteria which are used to define the need for further evaluation when point source data is found in excess of the associated PRG. Location 24 and the three discrete soil borings that were composited are shown on Figure 4.

Based on these findings, Sunkist requested that the specific samples collected from 2.5 feet at 11A, 11B and 11C were analyzed for PCBs. Similarly, it was requested that the specific samples collected from 0.5 feet at 24A, 24B and 24C were analyzed for total lead and TPH in the gasoline, diesel and motor oil ranges. Ontario authorized these additional analyses, and the results are contained in Attachment A.

The results from the additional analyses show that the sample collected from 11C contained 2.93 mg/kg of PCBs, while the samples collected from 11A and 11C were below the conservative screening criteria. In addition, the sample collected from 24C contained 234 mg/kg of total lead and 3,830 mg/kg of petroleum hydrocarbons in the motor oil range (C23-C35). Samples collected from 23A and 24B contained low concentrations of total lead and petroleum hydrocarbons. None of the total lead results from specific samples were found to be in excess of the conservative screening criteria. This is contradictory to the initial result obtained from the composited samples collected from 24A, 24B and 24C. However, the composited result does indicate that concentration of lead in excess of the CHHSL are present, and based on the relatively elevated concentration total lead and TPH observed at 24C, it is reasonable to assume that lead concentrations in excess of the CHSSL are, or were in the vicinity of 24C.

SCOPE OF WORK

BEC has evaluated the available data, and developed an approach towards achieving the program objectives. The following sub-sections summarize the proposed scope of work.

Task 1 - Pothole Excavations

Based on a review of the geophysical report which was provided as an attachment to the Limited Assessment, the six anomalies (A through F) are located as shown on Figures 3 and 4. As shown, some of these anomalies are very small, and may be associated with existing underground lines, or other non-UST related features. For instance, Anomalies C and D are 2 by 2 feet, and 2 by 4 feet in area, respectively, and have been located near existing sewer drain line.

In order to determine if USTs are present at any of these locations, BEC will implement a series of pothole excavations to depths of approximately 10 feet each. The number of pothole excavations per anomaly is summarized as follows:

- Anomaly A Three pothole excavations;
- Anomaly B Two pothole excavations;
- Anomaly C One pothole excavation;
- Anomaly D One pothole excavation;
- Anomaly E Six pothole excavations, and
- Anomaly F One pothole excavation.

Concrete above the anomalies will be removed. Following this a backhoe will be utilized to excavate at each of the locations to a depth of up to 10 feet. Soil will be observed and logged during the excavations, and field readings of organic vapor concentrations will be obtained. These observations and field measurements will be obtained to document the conditions. It is not anticipated that any soil sampling will be required during these efforts, as the goal of this task is to determine if USTs are present in any of the areas defined as anomalous. As such, it is assumed that excavated soil will be returned to the hole once the total depth of each excavation has been reached.

Task 2 - Soil Removal Action

Limited soil excavations will be implemented in the three potential areas of concern. Based reported depth of the impacted soil as defined in the Limited Assessment, and the result of the additional analyses, the extent of these excavations has been defined, as described as follows:

• **Location 11C** – The extent of this excavation will be approximately 5 feet by 5 feet in area, with a depth of approximately 3.5 feet;

- **Location 20** The extent of this excavation will be approximately 5 feet by 5 feet in area, with a depth of approximately 1 foot;
- **Location 24C** The extent of this excavation will be approximately 5 feet by 5 feet in area, with a depth of approximately 1 foot.

Concrete above the planned excavation area will be removed. Following this, a backhoe will be utilized to excavate at each of the locations to the designed extent. Soil will be observed and logged during the excavations, and field readings of organic vapor concentrations will be obtained. These observations and field measurements will be obtained to document the conditions.

Assuming that the field observations do not indicate the presence of more extensive impacts, the excavations will be halted at the designed extent, and confirmation soil samples will be collected. These confirmation samples will be collected from each of the four sidewalls (middle, near the midpoint in depth), and from the floor (near the center). The confirmation samples will be analyzed for the chemicals that were observed to be in excess of the conservative screening criteria. As such, the confirmations samples collected from Location 11C and 20 will be analyzed for PCB by USEPA Method 8082. Confirmation samples collected from Location 24C will be analyzed for total lead by USEPA Method 6010B or 7420.

Once final confirmation samples have been received, the excavated soil will be properly characterized and disposed of off Site. The excavations will be backfilled as necessary with clean imported fill or slurry.

SCHEDULE

It will take one week to mobilize equipment and personnel to the Site. The pothole and remedial excavations will be implemented and confirmation samples results will be obtained over a three week period. Following this, it will take an additional three weeks to complete the Excavation Report. Based on this schedule, if work is authorized by March 30, 2009 the Excavation Report should be available by May 15, 2009.

CLOSING

This Work Plan has been prepared to summarize recommended environmental activities to be performed in association with the closure of the former Sunkist Citrus

Processing Plant located in Ontario, California. If you should have any questions regarding this Work Plan, or any other issue, please do not hesitate to call.

Sincerely,

Brett H. Bowyer, P.G.

Principal

Bowyer Environmental Consulting, Inc.

Attachments: Figures 1 through 4

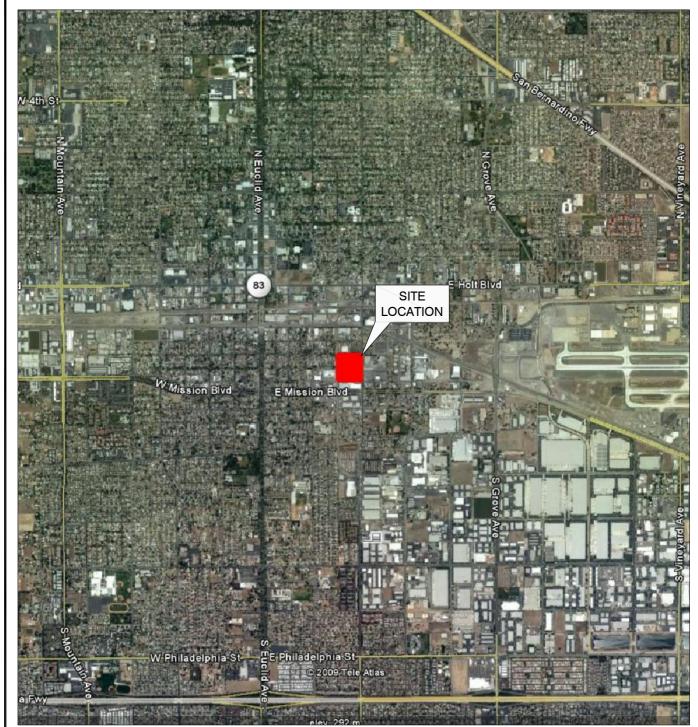
Attachment 1 - Laboratory Reports for Additional Analyses

Cc: Ted Lehman – Sunkist Growers

Greg Devereaux - Ontario City

Gregory Middleton - Leighton Consulting, Inc.









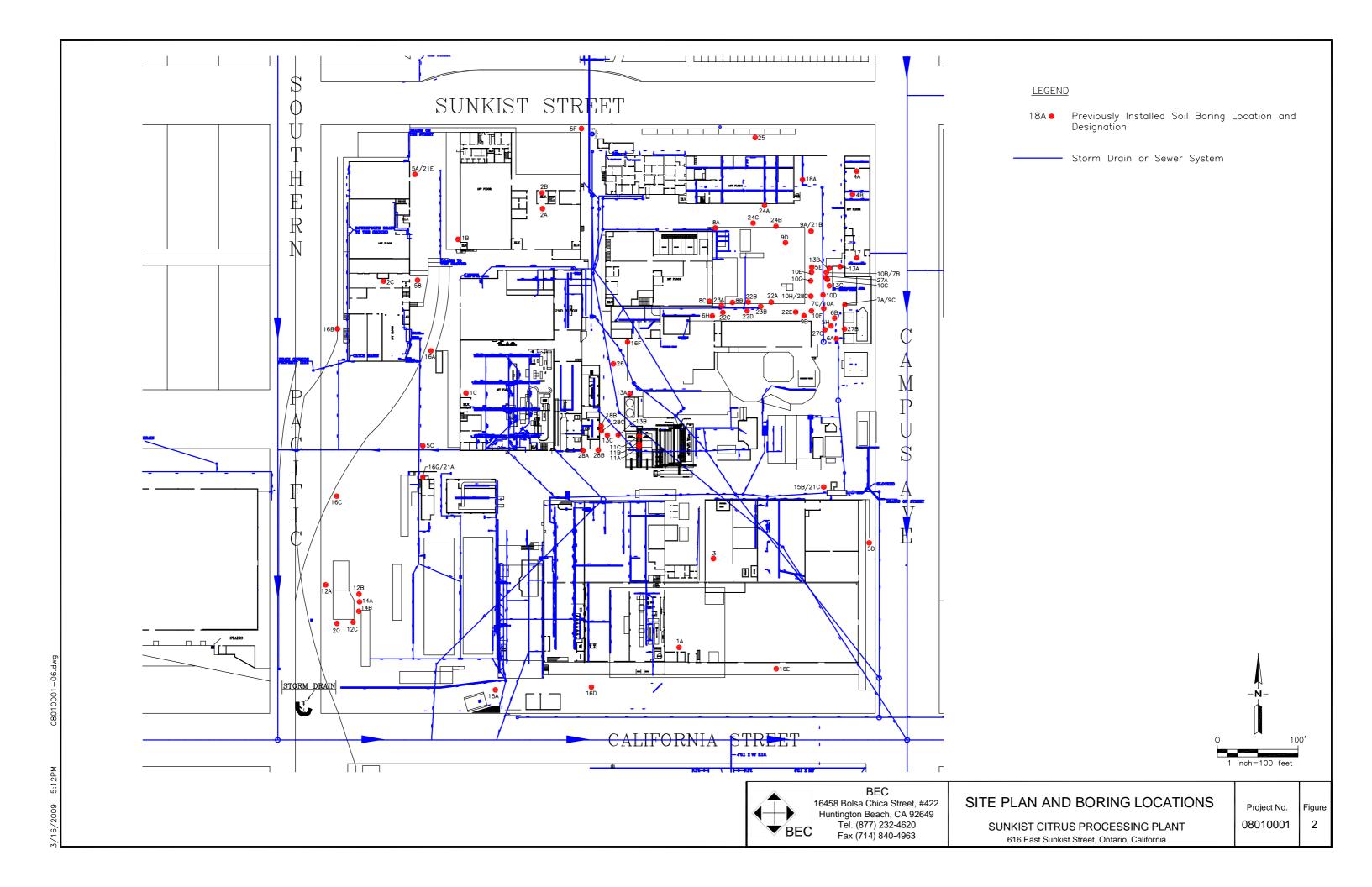
BEC

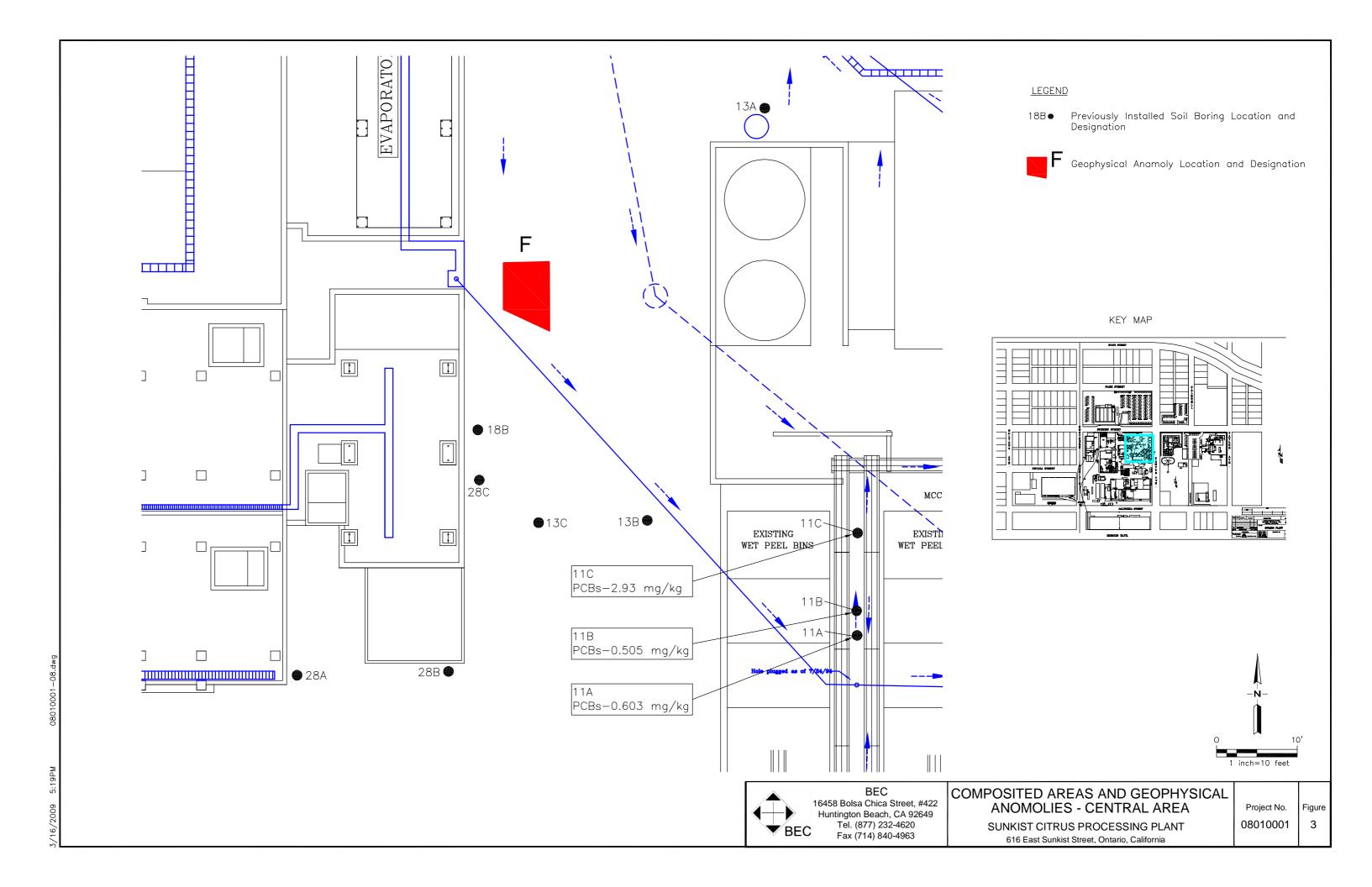
16458 Bolsa Chica Street, #422 Huntington Beach, CA 92649 Tel. (877) 232-4620 Fax (714) 840-4963

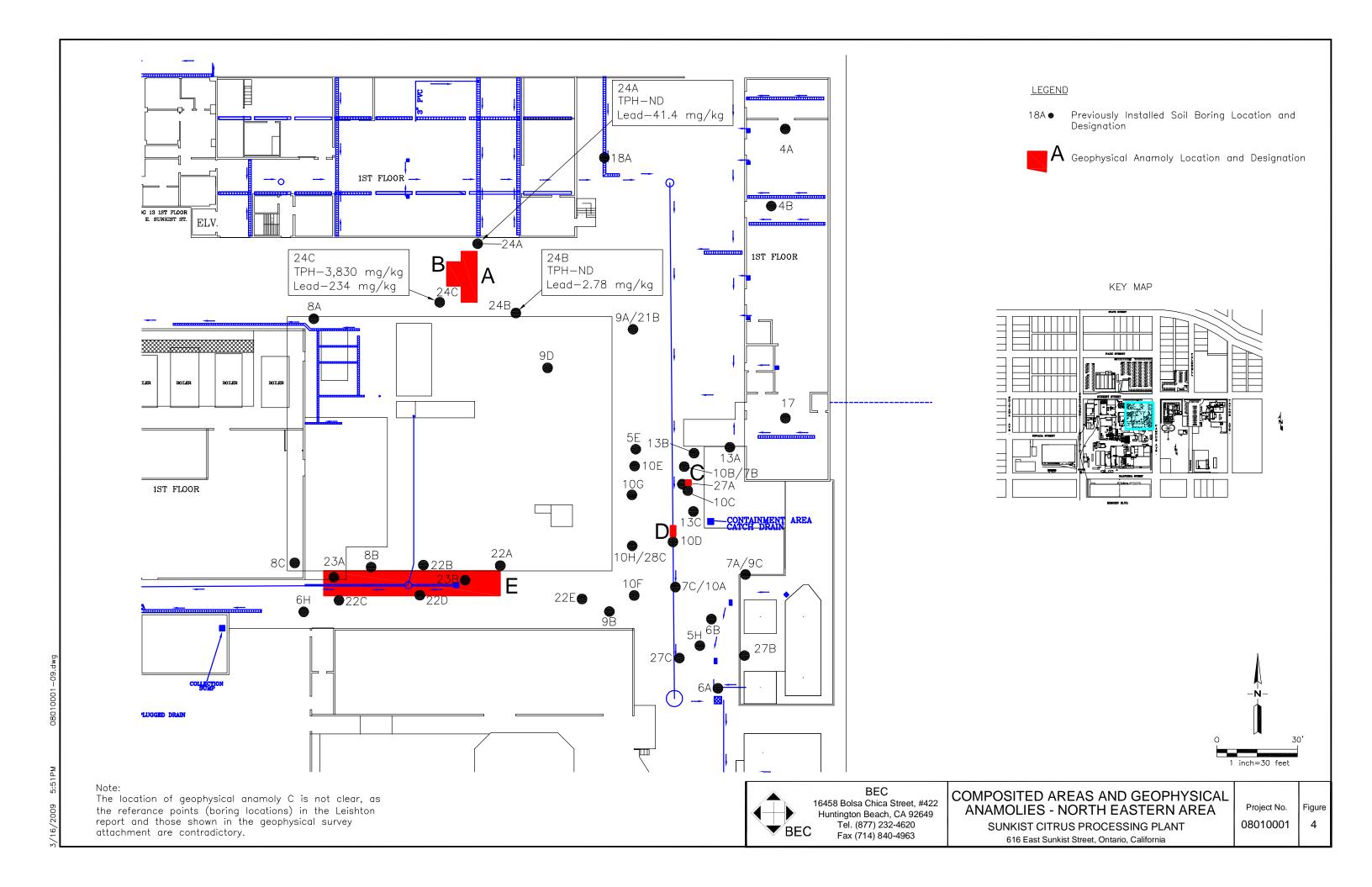
SITE LOCATION MAP

SUNKIST CITRUS PROCESSING PLANT 616 East Sunkist Street, Ontario, California Project No. 08010001

Figure 1







Attachment A Laboratory Reports – Additional Analyses

1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

Date: March 12, 2009

Mr. Greg Middleton Leighton Consulting, Inc. 10532 Acacia, Suite B-6 Rancho Cucamonga, CA 91730 Tel(909)484-2205 Fax(909)484-2170

Project No: 602315-002 GKM

Lab I.D.: 081021-13 through -33

Dear Mr. Middleton:

The additional TPH-CCID & Pb results for the soil samples, received by our lab on October 21, 2008, are attached. The samples were received chilled, intact, accompanying chain of custody and also stored per the EPA protocols.

Trace concentrations between the MDL and the PQL have been reported with a "J" flag indicator.

Enviro-Chem appreciates the opportunity to provide you and your company this and other services. Please do not hesitate to call us if you have any questions.

Sincerely,

Curtis Desilets

Vice President/Program Manger

er gro z h

Jesse Tu, Ph.D.

Laboratory Manager

1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

LABORATORY REPORT

CUSTOMER: Leighton Consulting

10532 Acacia, Suite B-6, Rancho Cucamonga, CA 91730

Tel(909)484-2205 Fax(909)484-2170

PROJECT No: 602315-002 GKM

DATE RECEIVED: 10/21/08

MATRIX:SOIL

DATE EXTRACTED: 03/10/09

SAMPLING DATE: 10/20/08

DATE ANALYZED: 03/10/09

REPORT TO:Mr. GREG MIDDLETON

DATE REPORTED: 03/12/09

TOTAL PETROLEUM HYDROCARBONS (TPH) - CARBON CHAIN ANALYSIS METHOD: EPA 8015B

UNIT: MG/KG = MILLIGRAM PER KILOGRAM = PPM

SAMPLE I.D.	LAB I.D.	C4-C10	C11-C22	C23-C35	DF	
DP-24A-0.5	081021-18	ND	ND	ND	1_	
DP-24B-0.5	081021-23	ND	ND	ND	1_	
DP-24C-0.5	081021-33	ND	ND	3830	20	
METHOD BLANK		ND	ND	ND	1_	No.
	MDL	5 10	5 10	25 50		
	PQL	TO	10	J 0		

COMMENTS

C4-C10 = GASOLINE RANGE

C11-C22 = DIESEL RANGE

C23-C35 = MOTOR OIL RANGE

DF = DILUTION FACTOR

MDL = METHOD DETECTION LIMIT

PQL = PRACTICAL QUANTITATION LIMIT

J = TRACE CONCENTRATION BETWEEN MDL AND PQL

ACTUAL DETECTION LIMIT = DF X PQL

ND = NON-DETECTED OR BELOW THE ACTUAL DETECTION LIMIT

Data Reviewed and Approved by:

1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

LABORATORY REPORT

CUSTOMER: Leighton Consulting

10532 Acacia, Suite B-6, Rancho Cucamonga, CA 91730

Tel(909)484-2205 Fax(909)484-2170

PROJECT No: 602315-002 GKM

MATRIX: SOIL DATE RECEIVED: 10/21/08 SAMPLING DATE: 10/20/08 DATE ANALYZED: 03/10/09

REPORT TO: Mr. GREG MIDDLETON DATE REPORTED: 03/12/09

SAMPLE I.D.: DP-24A-0.5

LAB I.D.: 081021-18

TOTAL THRESHOLD LIMIT CONCENTRATION ANALYSIS UNIT: MG/KG = MILLIGRAM PER KILOGRAM = PPM

element Analyzed	SAMPLE RESULT	PQL	MDL	DF	TTLC LIMIT		epa Method
Lead(Pb)	41.4	0.5	0.192	1	1,000	5.0	6010B

COMMENTS

DF = Dilution Factor

MDL = Method Detection Limit

PQL = Practical Quantitation Limit

J = Trace Concentration between MDL and PQL

Actual Detection Limit = PQL X DF

TTLC = Total Threshold Limit Concentration

STLC = Soluble Threshold Limit Concentration

* - STLC analysis for the metal is recommended (if marked)

*** = The concentration exceeds the TTLC Limit, and the sample is defined as hazardous waste as per CCR-TITLE 22 (if marked)

Data Reviewed and Approved by:_

1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

LABORATORY REPORT

CUSTOMER: Leighton Consulting

10532 Acacia, Suite B-6, Rancho Cucamonga, CA 91730

Tel(909)484-2205 Fax(909)484-2170

PROJECT No: 602315-002 GKM

MATRIX: SOIL

DATE RECEIVED: 10/21/08

SAMPLING DATE: 10/20/08

DATE ANALYZED: 03/10/09

REPORT TO:Mr. GREG MIDDLETON

DATE REPORTED: 03/12/09

SAMPLE I.D.: DP-24B-0.5 LAB I.D.: 081021-23

TOTAL THRESHOLD LIMIT CONCENTRATION ANALYSIS

UNIT: MG/KG = MILLIGRAM PER KILOGRAM = PPM

ELEMENT ANALYZED	Sample Result	PQL	MDL	DF	TTLC LIMIT	•	EPA METHOD
Lead(Pb)	2.78	0.5	0.192	1	1,000	5.0	6010B

COMMENTS

DF = Dilution Factor

MDL = Method Detection Limit

PQL = Practical Quantitation Limit

J = Trace Concentration between MDL and PQL

Actual Detection Limit = PQL X DF

TTLC = Total Threshold Limit Concentration

STLC = Soluble Threshold Limit Concentration

* = STLC analysis for the metal <u>is</u> recommended (if marked)

*** = The concentration exceeds the TTLC Limit, and the sample is defined as hazardous waste as per CCR/TITLE 22 (if marked)

Data Reviewed and Approved by:

1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

LABORATORY REPORT

CUSTOMER: Leighton Consulting

10532 Acadia, Suite B-6, Rancho Cucamonga, CA 91730

Tel(909)484-2205 Fax(909)484-2170

PROJECT No: 602315-002 GKM

MATRIX: SOIL

DATE RECEIVED: 10/21/08

SAMPLING DATE:10/20/08

DATE ANALYZED:03/10/09

REPORT TO: Mr. GREG MIDDLETON

DATE REPORTED: 03/12/09

SAMPLE I.D.: DP-24C-0.5

LAB I.D.: 081021-33

______ TOTAL THRESHOLD LIMIT CONCENTRATION ANALYSIS UNIT: MG/KG = MILLIGRAM PER KILOGRAM = PPM

ELEMENT ANALYZED	SAMPLE RESULT	PQL	MDL	DF	TTLC LIMIT		epa Method
Lead (Pb)	234 *	0.5	0.192	1	1,000	5.0	6010B

COMMENTS

DF = Dilution Factor

MDL - Method Detection Limit

POL = Practical Quantitation Limit

J = Trace Concentration between MDL and PQL

Actual Detection Limit = PQL X DF

TTLC = Total Threshold Limit Concentration

STLC = Soluble Threshold Limit Concentration

* = STLC analysis for the metal is recommended (if marked)

*** = The concentration exceeds the TTLC Limit, and the sample is defined as hazardous waste as per CCRATITLE 22 (if marked)

Data Reviewed and Approved by:

From: Curtis Desilets [curt@enviro-chemlab.com]

Sent: Monday, March 09, 2009 3:22 PM

To: jessica.lin@enviro-chemlab.com Subject: FW: Discrete sample analysis

Please proceed.

Curtis Desilets Senior Vice President Enviro-Chem, Inc. (909) 590-5905 ----Original Message---

From: Gregory Middleton [mailto:gmiddleton@leightongroup.com]

Sent: Monday, March 09, 2009 3:07 PM

To: curt@enviro-chemlab.com

Cc: Zachary Freeman

Subject: FW: Discrete sample analysis

Curt.

If possible can we get the discrete analysis run on the following samples that collected back in October of 2008? They were collected as a part of our Project Number 602315-002 (Ontario Sunkist)

Leighton ID	Lab ID	No of Discrete Samples	Analyses to be Performed		
	DP -24C-0.5 = 08/02/-32				
C024-0.5	081021-18,_23,_33 DP-24B-0.5=081021-18 DP-24A-0.5=U81021-23	3	Lead - TTLC- Solid/Soil	TPH – Carbon chain- EPA 8015B	
C-11-2.5	08009-46,4850	3	PCBs - EPA 8082		

We've finally received the authorization from the City to proceed.

Greg K. Middleton, PG., CHG.

Senior Project Geologist
10532 Acacia St. Suite B-6
Rancho Cucamonga, CA 91730
909 527 - 8783 "office"
951 500 - 3500 "cell"
909 484 - 2170 "fax"
Leighton
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Checked by AVG.

Version: 7.5.557 / Virus Database: 270.11.9/1991 - Release Date: 3/9/2009 7:14 AM

Enviro – Chem, Inc. 1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

Date: March 13, 2009

Mr. Greg Middleton Leighton Consulting, Inc. 10532 Acacia, Suite B-6 Rancho Cucamonga, CA 91730 Tel(909)484-2205 Fax(909)484-2170

Project No: 602315-002 GKM

Lab I.D.: 081009-38 through -52

Dear Mr. Middleton:

The additional PCBs results for the soil samples, received by our lab on October 9, 2008, are attached. The samples were received chilled, intact, accompanying chain of custody and also stored per the EPA protocols.

Trace concentrations between the MDL and the PQL have been reported with a "J" flag indicator.

Enviro-Chem appreciates the opportunity to provide you and your company this and other services. Please do not hesitate to call us if you have any questions.

Sincerely,

Curtis Desilets

Vice President/Program Manger

Jesse Tu, Ph.D.

Laboratory Manager

1214 E. Lexington Avenue, Pomona, CA 91766 Tel (909) 590-5905 Fax (909) 590-5907

LABORATORY REPORT

CUSTOMER: Leighton Consulting

10532 Acacia, Suite B-6, Rancho Cucamonga, CA 91730

Tel(909)484-2205 Fax(909)484-2170

PROJECT No: 602315-002 GKM

DATE RECEIVED: 10/09/08

MATRIX: SOIL SAMPLING DATE: 10/08/08

DATE EXTRACTED: 03/11/09 DATE ANALYZED: 03/11/09

REPORT TO: Mr. GREG MIDDLETON

DATE REPORTED: 03/13/09

PCBs ANALYSIS METHOD: EPA 8082

UNIT: MG/KG = MILLIGRAM PER KILOGRAM = PPM

SAMPLE I.D.	LAB I.D.	PCB- 1016	PCB- 1221	PCB- 1232	PCB- 1242	PCB- 1248	PCB- 1254	PCB- 1260	TOTAL PCBs*	DF
111 5	5 081009-46	ND_	ND_	ND	ND	ND	0.603	ND	0,603	20 20
HA-114-4-	5 081009-48	ND	ND	ND	ND	NĎ	0.505		2.93_	100
HA-110-4-	5 081009-50	ND	ND	ND	ND	ND	2.93	ND	2.93	100
Method Bla		ND	NĎ	D	ND	ND	ND	ND	ND	1_
	MDL	0.0		005 0.0	005 0.0	005 0.0 01 0.0	005 0.005 01 0.01	0.0 0.0	- 44	

COMMENTS

DF = DILUTION FACTOR

MDL = METHOD DETECTION LIMIT

PQL = PRACTICAL QUANTITATION LIMIT

J = TRACE CONCENTRATION BETWEEN MDL AND PQL

ACTUAL DETECTION LIMIT = PQL X DF

ND = NON-DETECTED OR BELOW THE ACTUAL DETECTION LIMIT

* = SUM OF THE PCB 1016, 1221, 1232, 1242, 1248, 1254 AND 1260

*** = THE CONCENTRATION EXCEEDS THE TTLC LIMIT OF 50, AND THE SAMPLE IS DEFINED AS HAZARDOUS WASTE AS MER CCR-TITLE 22 (IF MARKED)

Data Reviewed and Approved by:___

Curtis Desilets [curt@enviro-chemlab.com] From:

Monday, March 09, 2009 3:22 PM Sent

jessica.lin@enviro-chemiab.com To:

Subject: FW: Discrete sample analysis

Please proceed.

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Leighton ID Lab ID		No of Discrete Samples	Analyses to be Performed		
C024-0.5	081021-18,23,33	3	Lead – TTLC- Solid/Soil	TPH – Carbon chain- EPA 8015B	
C-11-2.5	08009-46, 48 50	3	PCBs EPA 8082		

081009-46, 48,50

We've finally received the authorization from the City to proceed.

Greg K. Middleton, PG., CHG.

Senior Project Geologist 10532 Acacia St. Suite B-6 Rancho Cucamonga, CA 91730 909 527 - 8783 "office" 951 500 - 3500 "cell" 909 484 - 2170 "fax"

Leighton

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081009 - 46 = HA - 11A - 2.5 -48 = HA - 11B - 2.5 4 - 50 = HA - 11C - 2.5

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Checked by AVG.

Version: 7.5.557 / Virus Database: 270.11.9/1991 - Release Date: 3/9/2009 7:14 AM

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